

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
(MIAMI DIVISION)**

JANE DOE,

Plaintiff,

v.

STEVEN K. BONNELL II,

Defendant.

CASE NO: 1:25-cv-20757-JB/Torres

**PLAINTIFF'S MOTION TO HAVE JUNE 3RD, 2025 EVIDENTIARY HEARING
TRANSCRIPT FILED UNDER SEAL**

COMES NOW, Jane Doe, by and through the undersigned counsel, Pursuant to Local Rule 5.4 of the Southern District of Florida, Fed. R. Civ. P. 26(c)(1), and 15 U.S.C. §6851, and hereby respectfully requests this Court that the transcript of the evidentiary hearing on the preliminary injunction (“the transcript”) be filed under seal.

In support thereof, Jane Doe states as follows:

The evidentiary hearing with regards to Plaintiff's Motion For Temporary Injunction and Preliminary Injunction [ECF No. 21] was conducted on June 3, 2025. The transcript, which has yet to be published or filed, contains highly sensitive, private, and confidential information, including personal details with regards to the identity of Ms. Doe, details concerning Ms. Doe's harm and suffering because of Defendant's actions, and sexually explicit content.

Filing the transcript under seal is necessary to protect the privacy and confidentiality of the information contained therein. Plaintiff requests that the seal remain in place for the duration of the litigation, including any appeals, to ensure ongoing protection of the identities of the witnesses. This duration is consistent with the need to prevent further emotional and psychological harm to

Plaintiff and the individuals referenced in her testimony, as supported by *Doe Williams v. Williams*, 2024 U.S. Dist. (S.D. Miss. May 31, 2024), which noted that §6851's purpose is to protect against the publicization of intimate matters.

The Eleventh Circuit recognizes a “presumptive common law right to inspect and copy judicial records,” but this right is not absolute and may be overcome by a showing of good cause. *Romero v. Drummond Co.*, 480 F.3d 1234, 1245-46 (11th Cir. 2007). Courts balance the public’s right of access against the party’s interest in confidentiality, considering factors such as “whether allowing access would impair court functions or harm legitimate privacy interests, the degree of and likelihood of injury if made public, … and the availability of a less onerous alternative to sealing the documents.” *Romero*, 480 F.3d at 1246; *See Jankula v. Carnival Corp.*, 2019 WL 8051719 at *2 (S.D. Fla. September 5, 2019).

Plaintiff has established the need for the transcript to be filed under seal. Sealing is necessary to protect the substantial privacy interests of the Plaintiff and other individuals mentioned throughout said hearing.

Filing the transcript under seal will not prejudice any party, as the unredacted transcript will remain accessible to the Court and the parties involved in this matter, Ms. Doe simply wishes to keep her identity and the private details discussed at the hearing confidential from the public as the matters discussed at the hearing were both highly sensitive and personal.

WHEREFORE, Jane Doe respectfully requests that this Court grant this Motion and enter an order permitting the transcript to be filed under seal.

CERTIFICATE OF CONFERRAL PURSUANT TO LOCAL RULE 7.1(a)(2)

WE HEREBY CERTIFY that, pursuant to Local Rule 7.1(a)(2), the undersigned counsel conferred via email on June 3, 2025, with counsel for Defendant in a good-faith effort to resolve

the issues raised in this motion and were unable to reach an agreement on resolving or further narrowing the issues.

Dated: June 4th, 2025

Respectfully submitted,

**SANCHEZ-MEDINA, GONZALEZ, QUESADA,
LAGE, GOMEZ & MACHADO, LLP**

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By: _____
CARLOS A. GARCIA PEREZ
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on June 4th, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF filing system and copies were electronically sent to all counsel of records via the same.

By: /s/*Carlos A. Garcia Perez*
CARLOS A. GARCIA PEREZ
Attorney for Plaintiff